

# **EXHIBIT 2**

[Counsel Listed on Signature Page]

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB

**PLAINTIFFS' INITIAL WITNESS LIST**

Judge: Hon. Charles R. Breyer

This Document Relates to:

*Jaylynn Dean v. Uber Technologies, Inc.,  
et al.*, CV-25-4276-PHX-CRB

Pursuant to Fed. R. Civ. P. 26(a)(3)(A), Plaintiff Jaylynn Dean ("Plaintiff") hereby discloses the following list of witnesses who are expected to be called or may be called in Plaintiff's case in chief at trial.

1. Expert Witnesses

Name	May Call/Will Call	Live or Video
John Chandler <i>Expert</i>	May Call	Live
Minnette "Meme" Drumwright <i>Expert</i>	Will Call	Live
Jay Feldis <i>Expert</i>	May Call	Live

Robert Johnson <i>Expert</i>	Will Call	Live
Lacey Keller <i>Expert</i>	Will Call	Live
Mindy Mechanic <i>Expert</i>	Will Call	Live
Cynthia Rando <i>Expert</i>	May Call	Live
Tom Tremblay <i>Expert</i>	Will Call	Live
Veronique Valliere <i>Expert</i>	Will Call	Live
Bruce Weiner <i>Expert</i>	May Call	Live

## 2. Fact Witnesses

<b>Name</b>	<b>May Call/Will Call</b>	<b>Live or Video</b>
Michael Akamine <i>Director of Product Management</i>	May Call	Video
Brooke Anderson <i>Head of Product Communications</i>	May Call	Video
Emilie Boman <i>Director, Global Public Policy - Safety, Sustainability &amp; Privacy</i>	May Call	Video
Tracy Breeden <i>Former, Head of Global Women's Safety &amp; Gender-Based Violence</i>	May Call	Live or Video (Phoenix-based witness)
Gregory "Greg" Brown <i>Director, Head of Central Safety</i>	May Call	Video
Frank Chang <i>VP, Applied Science</i>	May Call	Video
Heather Childs <i>Chief Ethics, Compliance &amp; Security Officer</i>	May Call	Video
Allison Cissna <i>Team Lead, Trust and Safety Investigations</i>	May Call	Live or Video (Phoenix-based witness)

1	Chad Dobbs <i>Head of US City Operations</i>	May Call	Video
2	Mariana Esteves <i>Group Product Manager – Safety</i>	May Call	Video
3			
4	Cory Freivogel <i>Head of US &amp; Canada Platform Safety Operations</i>	May Call	Video
5			
6	Henry “Gus” Fuldner <i>Senior Vice President of Safety &amp; Core Services</i>	Will Call	Live requested but otherwise by video
7			
8	Todd Gaddis <i>Manager II Data Analytics</i>	May Call	Video
9			
10	Ryan Graves <i>Former, Chief Executive Officer</i>	May Call	Video
11	Andrew Hasbun <i>Head of Global Safety Communications</i>	May Call	Video
12			
13	Jill Hazelbaker <i>Chief Marketing Officer and Senior Vice President, Communications &amp; Public Policy</i>	May Call	Video
14			
15			
16	Roger Kaiser <i>Former, Head of Safety</i>	May Call	Video
17	Travis Kalanick <i>Former, Chief Executive Officer</i>	May Call	Video
18			
19	Sachin Kansal <i>Chief Product Officer</i>	May Call	Video
20	Dara Khosrowshahi <i>Chief Executive Officer</i>	May Call	Video
21			
22	Jenny Luu <i>Director, Safety Access &amp; Identity</i>	May Call	Video
23			
24	Katherine “Katy” McDonald <i>Director of Data Science</i>	Will Call	Live requested but otherwise by video
25			
26	Hannah Nilles <i>Director, Head of Safety – Americas</i>	May Call	Video
27			
28			

Katherine “Kate” Parker <i>Former, Global Director - Product Marketing, Brand Management &amp; Strategic Initiatives</i>	May Call	Video
Rebecca Payne <i>Former, Group Product Manager - Safety</i>	May Call	Video
Andi Pimentel <i>Chief of Staff to Chief Executive Officer</i>	May Call	Video
Elizabeth Ross <i>Head of Product Marketing, Safety &amp; Sustainability</i>	May Call	Video
Danielle Sheridan <i>Former, Senior Director &amp; General Manager, Head of US Cities and Director, Head of US &amp; Canada Platform Safety, Standards, and Quality</i>	May Call	Video
Valerie Shuping <i>Former, Senior Global Safety Program Manager</i>	May Call	Video
Troy Stevenson <i>Global Head of Customer Operations</i>	May Call	Video
Joseph “Joe” Sullivan <i>Former, Chief Security Officer</i>	May Call	Video
Michael Sullivan <i>Senior Director, Trust &amp; Safety</i>	May Call	Video
Sunny Wong <i>Senior Manager, Applied Science - Safety</i>	Will Call	Live requested— otherwise by video
Kenyaun “Kenny” Bagby <i>Hotel Clerk</i>	May Call	Live
Jaylynn Dean <i>Plaintiff</i>	Will Call	Live
Elisa Gregg <i>Plaintiff’s friend</i>	May Call	Live or by video

1	Scott McLaughlin <i>Percipient witness</i>	May Call	Live or by video
2	Jadyn “Jade” Peterson <i>Plaintiff’s friend</i>	May Call	Live or by video
3			
4	Olajuwon Ramos <i>Plaintiff’s father</i>	May Call	Live or by video
5			
6	Natasha Ramos <i>Plaintiff’s mother</i>	May Call	Live or by video
7			
8	Dani Fae Smith <i>Plaintiff’s friend</i>	May Call	Live or by video
9			
10	Hassan Turay <i>Uber driver</i>	Will Call	Live or by video
11			
12	Jessica Weaver <i>SAFE nurse</i>	Will Call	Live or by video— stipulation requested for option to call by video
13			
14	Custodian of Records (Uber, Tempe Police Department and/or other third party as needed)	May Call	Live
15			
16	Sponsoring Witness(es) for Voluminous Materials	May Call	Live
17			

18 In serving this witness list, Plaintiff specifically reserves the right to amend, supplement, or  
19 otherwise modify these disclosures if new or modified information is provided at any point. Plaintiff also  
20 reserves the right to supplement and/or to amend its list with any witnesses identified on Defendant’s  
21 witness list. Plaintiff further reserves the right to supplement and/or to amend this witness list in response  
22 to rulings of the Court on pretrial motions. Plaintiff reserves the right to call any of these witnesses and  
23 any of Defendants’ witnesses whose testimony is designated as live witnesses in its case in chief. Plaintiff  
24 reserves the right to amend and/or supplement its witness list based on testimony and witness disclosures  
25 presented by Defendants.

Dated: December 8, 2025

By: /s/ Sarah R. London

Sarah R. London (SBN 267083)

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